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8 Attorneys for Defendant
Lead Intelligence, Inc. d/b/a Jornaya

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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 LORETTA WILLIAMS, individually and on
13 behalf of all others similarly situated,

14 Plaintiff,

15 v.

16 DDR MEDIA, LLC, a Pennsylvania limited
liability company, and LEAD
17 INTELLIGENCE, INC., a Delaware
corporation, d/b/a Jornaya,

18 Defendants.
19

Case No. 3:22-cv-3789-SI

**STIPULATION PURSUANT TO CIVIL
L.R. 6-1(B) AND ORDER AS
MODIFIED BY THE COURT TO
MODIFY CASE SCHEDULE**

Judge: Hon. Susan Illston

1 Pursuant to Local Rule 6-1(b), Plaintiff Loretta Williams and Defendants DDR Media, LLC
2 (“DDR”) and Lead Intelligence, Inc., d/b/a Jornaya (“Jornaya”), by and through the undersigned
3 counsel, hereby stipulate and agree to the following proposed modification of the case schedule:

4 WHEREAS, the Complaint was served on Jornaya on June 30, 2022 and DDR waived
5 service on September 22, 2022;

6 WHEREAS, the current deadline for Defendants to answer or otherwise respond to the
7 Complaint is November 21, 2022;

8 WHEREAS, Defendants intend to file a motion to compel arbitration; and

9 WHEREAS, the parties have met and conferred regarding a briefing schedule;

10 The parties hereby stipulate to the following:

- 11 • Defendants’ motion(s) to compel arbitration shall be due December 15, 2022.
- 12 • Plaintiff’s opposition to Defendants’ motion(s) shall be due January 14, 2023.
- 13 • Defendants’ reply(ies) shall be due January 29, 2023.
- 14 • Defendants’ deadline to answer or otherwise respond to the Complaint shall be
15 continued to a date thirty (30) days after any denial by the Court of the motion(s) to
16 compel arbitration.


17 The parties have sought three prior extensions to the deadline to answer or otherwise
18 respond because they determined that it would serve their interests and the interest of judicial
19 efficiency to align the schedules for all parties. By entering into this stipulation, Jornaya does not
20 intend to waive any defense or to consent to the jurisdiction of this Court.

Dated: November 17, 2022

By: /s/ Patrick Peluso
Patrick Peluso
WOODROW PELUSO LLP
Attorneys for Plaintiff

The hearing will be set for 2/17/2023 at 10 a.m. via Zoom webinar.

IT IS SO ORDERED.

By: 
Hon. Susan Illston
U.S. DISTRICT JUDGE

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Attestation re Electronic Signatures

I, Rebecca Harlow, attest pursuant to Northern District Local Rule 5-1(i)(3) that all other signatories to this document, on whose behalf this filing is submitted, concur in the filing's contents and have authorized this filing. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: November 17, 2022

By: /s/ Rebecca Harlow
REBECCA HARLOW